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August 12, 2020

The Hon. Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *Rich v. Fox News Network LLC, et al.*, No. 18-cv-2223 – Re. Dkt. No. 168

Dear Judge Netburn:

On July 29, 2020, the Court ordered the parties to either (1) publicly file on ECF all documents that they had previously filed under seal related to the motion to dismiss or the motion to compel or (2) apply to file those documents under seal or with redactions. Plaintiffs have conferred with Defendants Fox News Network and Edward Butowsky concerning those documents. It is our understanding that Fox will publicly file Exhibit A to its May 11, 2020 letter. Plaintiffs are also publicly filing the following documents:

- Plaintiffs' May 6, 2020 Letter and Exhibits 1 and 2;
- Plaintiffs' May 14, 2020 Letter; and
- Plaintiffs' July 20, 2020<sup>1</sup> Letter and Exhibits E, H, and K.

Regarding the remaining documents, Plaintiffs do not believe that any of them should be filed under seal or redacted. However, Defendants have informed us that they intend to file

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<sup>1</sup> The Court's order refers to Plaintiffs' July 23, 2020 Letter. Plaintiffs believe that reference should have been to Plaintiffs' July 20, 2020 Letter.

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applications with the Court to either keep the documents sealed or to redact them. Those documents are:

- Fox's May 11, 2020 Letter and Exhibit B;
- Exhibit H to Plaintiffs' June 23, 2020 Letter;
- Plaintiffs' July 10, 2020 Letter; and
- Exhibits A, B, C, D, and J to Plaintiffs' July 20, 2020 Letter

Again, Plaintiffs do not believe any of these documents should properly be sealed, and will respond to Fox or Mr. Butowsky's arguments in their separate submissions if necessary.

Respectfully,

*/s/ Beatrice Franklin*

Beatrice Franklin

*Counsel for Joel and Mary Rich*